

1 MICHELE C. BARNES (SBN 187239)
michele.barnes@klgates.com
2 ROSEANNA M. CASTILLO (SBN 252761)
roseanna.castillo@klgates.com
3 K&L GATES LLP
Four Embarcadero Center, Suite 1200
4 San Francisco, CA 94111
Telephone: (415) 882-8200
5 Facsimile: (415) 882-8220
6 Attorneys for Defendants
SHANGHAI ZHENHUA HEAVY
7 INDUSTRIES CO., LTD. (erroneously
sued as SHANGHAI ZHENHUA
8 PORT MACHINERY CO., LTD) AND
SEASIDE TRANSPORTATION SERVICES, LLC
9

10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION
14

15 JACKIE ARNETT,

16 Plaintiff,

17 vs.

18 SHANGHAI ZHENHUA PORT MACHINERY
CO. LTD.; SEASIDE TRANSPORTATION
19 SERVICES, LLC; WHITNEY EQUIPMENT
LLC; and DOES 1 through 100, inclusive,
20

21 Defendants.
22
23
24
25
26
27
28

Case No. 13-cv-01672

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEADLINES**

Judge: Hon. Vince G. Chhabria

Complaint Filed: March 1, 2013

1 WHEREAS, Plaintiff Jackie Arnett filed her complaint for damages naming only Defendants
2 Whitney Equipment LLC (“Whitney”) and Seaside Transportation Services, LLC (“STS”) in
3 Alameda County Superior Court on March 1, 2013.

4 WHEREAS defendants Whitney and STS removed this case to the Northern District on April
5 12, 2013.

6 WHEREAS on September 13, 2013, Plaintiff filed a First Amended Complaint adding
7 defendant Shanghai Zhenhua Heavy Industries Co., Ltd. (erroneously sued as Shanghai Zhenhua Port
8 Machinery Co., Ltd., hereinafter “ZPMC”.)

9 WHEREAS Plaintiff filed as Second Amended Complaint on November 4, 2013 in response
10 to ZPMC’s motion to dismiss Plaintiff’s First Amended Complaint.

11 WHEREAS ZPMC filed a motion to dismiss Plaintiff’s Second Amended Complaint, which
12 was granted in part and denied in part on January 13, 2014.

13 WHEREAS The Court granted Plaintiff leave to amend her negligence allegations in order to
14 clarify what conduct each defendant has allegedly engaged in that supports each of the theories
15 underlying her negligence causes of action.

16 WHEREAS Plaintiff filed her Third Amended Complaint on February 3, 2014, and parties
17 responded.

18 WHEREAS the Court set a Pre-trial Scheduling Order on April 1, 2014.

19 WHEREAS the Court amended the Pre-trial Scheduling Order on February 2, 2015, and
20 ordered parties to complete expert discovery by April 3, 2015.

21 WHEREAS parties have completed all noticed expert depositions except for the deposition of
22 Plaintiff’s expert Louis Cheng due to schedule conflicts.

23 WHEREAS parties are available to depose Mr. Cheng on April 10, 2015.

24 WHEREAS parties now request an extension of the expert discovery deadline for the limited
25 purpose of completing Mr. Cheng’s deposition on April 10, 2015.

1 NOW THEREFORE, IT IS STIPULATED by and between the parties, subject to the approval
2 of the Court pursuant to Local Rule 6-2, to extend discovery deadlines set in the case schedule (Dkt.
3 Nos. 69, 84, 95) as follows:

4 EVENT	CURRENT DEADLINE	REQUESTED EXTENSION DATE
5 Close of Expert Discovery for the 6 Limited Purpose of Deposing Mr. 7 Louis Cheng	April 3, 2015	April 10, 2015
8 Dispositive Motions Heard by	May 28, 2015	May 28, 2015 (no extension 9 requested)

K&L GATES LLP

Dated: 4/7/15

By: *Michelle C Barnes*
MICHELE C. BARNES
ROSEANNA M. CASTILLO
Attorneys for Defendants
SHANGHAI ZHENHUA PORT
MACHINERY CO., LTD

ARCHER NORRIS

Dated: 4/7/15

By: /s/ Keith R. Gillette
KEITH R. GILLETTE
CHAD D. GREESON
Attorneys for Defendant
WHITNEY EQUIPMENT, LLC

WILSON ELSE LLP

Dated: 4/7/15

By: /s/ William Enger
William Enger
Attorneys for Defendant SEASIDE
TRANSPORTATION SERVICES

THE ARNS LAW FIRM

Dated: *4.3.15*

By: *[Signature]*
ROBERT S. ARNS
JONATHAN E. DAVIS
Attorneys for Plaintiff
JACKIE ARNETT

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

2
3
4 Dated: April 8, 2015

By:



Hon. Vince G. Chhabria
U.S. District Court Judge